

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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UNITED STATES OF AMERICA,

Plaintiff,

ECF Case
15 Cr. 643 (PKC)

-against-

JASON W. GALANIS
JOHN P. GALANIS
JARED M. GALANIS
DEREK M. GALANIS
GARY T. HIRST, and
GAVIN L. HAMELS,

Defendants.

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**DECLARATION OF KEVIN V. RYAN IN SUPPORT OF MOTION FOR
LEAVE TO WITHDRAW AS COUNSEL**

I, Kevin V. Ryan, declare and state as follows:

1. Pursuant to Local Civil Rule 1.4 and Rule 2.5 of the Electronic Case Filing Rules and Instructions, I respectfully request leave of the court to withdraw as counsel for John Galanis in the above-captioned action. I hereby request that no further notices be given or required of me in this action, and that no documents of other pleadings in the action be served upon me.
2. On October 7, 2015 both Paul Grand and I appeared as counsel for John Galanis at his arraignment in the above referenced matter.
3. On November 9, 2015, the court, after a *Curcio* hearing, indicated that it might remove Paul Grand as co-counsel based upon conflict of interest rules. The court then gave John Galanis until 12/8/15 to retain new trial counsel. The court indicated that on this date it would also decide on the status of Paul Grand.

4. [REDACTED]
[REDACTED]
[REDACTED]

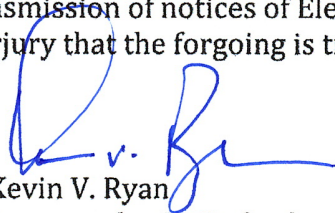
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9. In light of the foregoing, I respectfully request that the Court grant this motion for leave to withdraw as counsel in the above captioned matter and issue an order withdrawing the appearances of Kevin V. Ryan and or KVR LAW, and discontinuing transmission of notices of Electronic Filing. I declare under the penalty of perjury that the foregoing is true and correct.


Kevin V. Ryan
Attorney for Co-Defendant
John P. Galanis

Dated: November 24th, 2015
San Francisco, CA